

FSIS DIRECTIVE
AIR CONTAMINANTS SAFETY AWARENESS PROGRAM

4791.8

I. BACKGROUND

A new issuance, FSIS Directive 4791.8, Air Contaminants Safety Awareness Program, has been developed. This directive issues guidelines for developing and managing an air contaminants safety awareness program. Exposure limits for air contaminants are found in 29 CFR 1910.1000, Air Contaminants. A copy of this CFR section is distributed with FSIS Directive 4791.8 for referencing convenience.

II. CANCELLATION

Cancel this transmittal sheet when the directive is filed and the copy of 29 CFR 1910.1000 is received to use as needed. For recordkeeping purposes, users may retain or destroy this transmittal sheet.

Deputy Administrator
Administrative Management

Enclosure
29 CFR 1910.1000, Air Contaminants

All Inspection Offices; All Inspectors;
Plant Management; PRD; Union Officials

I0 - Resource Management
Staff

AIR CONTAMINANTS SAFETY AWARENESS PROGRAM

I. PURPOSE

This directive contains general provisions and guidelines to develop and manage an air contaminants safety awareness program

II. (RESERVED)

III. REASON FOR ISSUANCE

This directive establishes a program to monitor, detect, and report FSIS employee exposure to harmful air contaminants in plant environments.

IV. REFERENCES

FSIS Directive 4293.1, Personnel Records
FSIS Directive 4339.2, Medical Examinations for Employees Exposed to Hazardous Employment Conditions
FSIS Directive 4791.1, Basic Occupational Safety and Health Program
FSIS Directive 4791.5, Hazard Communication Program
FSIS Directive 4810.1, Injury Compensation
29 CFR 1910.1000, Air Contaminants
29 CFR 1910.1200, Hazard Communication
29 CFR 1960, Basic Program Elements for Federal Employee Occupational Safety and Health Programs and Related Matters
Executive Order 12196, Occupational Safety and Health Program for Federal Employees

V. FORMS AND ABBREVIATIONS

All Inspection Offices; All Inspectors;
Plant Management; PRD; Union Officials

IO - Resource Management Staff

CFR	Code of Federal Regulations
IH	Industrial Hygienist
IIC	Inspector-In-Charge
IO	Inspection Operations
IP	International Programs
MSDS	Material Safety Data Sheet
OSHA	Occupational Safety and Health Administration
OSH	Occupational Safety and Health
PELS	Permissible Exposure Limits
RP	Regulatory Programs

FSIS Form 4791-17, Log of Federal Occupational Injuries and Illnesses

VI. **POLICY**

It is FSIS policy to assure that safe and healthful working conditions are provided for all FSIS employees.

VII. **COVERAGE AND APPLICABILITY**

This directive covers all field employees with regulatory functions in IO, IP, and RP and applies to all FSIS employees required to work in or visit official plant locations where hazardous chemicals or toxic materials are used. **NOTE:** This directive does not cover FSIS employees who are or may have been exposed to biological contaminants while working in or visiting a plant.

VIII. **DEFINITIONS**

A. **Air Contaminant.** A toxic or hazardous material, chemical, or substance listed in 29 CFR 1910.1000. (**EXAMPLES:** ammonia, carbon dioxide, carbon monoxide, and chlorine.)

B. **Chemical Badge.** (Also called a detector tube.) A device that measures exposure levels of hazardous chemicals and toxic materials.

C. **Exposure.** Field employees with regulatory functions who are subjected by any route of entry including inhalation, ingestion, skin contact, and absorption during employment to a chemical or material that is a physical or health hazard. This includes potential (**EXAMPLES:** accidental or possible) exposure.

D. **Hazardous Chemical.** Any chemical that OSHA has determined is a

physical or health hazard.

E. **Industrial Hygienist.** A person with the academic knowledge and experience to determine the effects upon health of chemicals and physical agents under various levels of exposure. The IH is involved in monitoring, engineering, and analyzing methods to detect the extent of exposure for hazard control purposes.

F. **Regional OSH Official.** The full-time IO employee serving as the IO safety and health expert at the regional level.

G. **IO Safety and Health Manager.** The full-time IO employee serving as the primary and technical safety and health expert within IO.

H. **Material Safety Data Sheet.** Written or printed material on a hazardous chemical that is prepared according to the OSHA standard in 29 CFR 1910.1200.

I. **Toxic Material.** A material in a concentration or an amount exceeding the permissible limit established by OSHA, or that is of such toxicity it constitutes a recognized immediate or potential hazard.

IX. **AIR CONTAMINANTS MONITORING**

The in-plant supervisor or IIC, with assistance from the field office staff and Regional OSH Official, takes the following actions to effectively monitor exposure to air contaminants. (**NOTE:** A mechanical engineer, IH, or other qualified person may be used in the review and assessment process if determined to be necessary by the Regional OSH Official and the IO Safety and Health Manager.)

A. **Monitors Workplaces.** Conducts an air contaminants exposure review and assessment of the assigned plant when:

1. New hazardous chemicals are **introduced** into plant operations.
2. Employees complain of sore throats, headaches, or eyes and nose irritations, and air contaminants are suspected as the cause.

B. **Surveys Workplaces.** Determines if exposure to air contaminants exists within the plant by reviewing and assessing the:

1. Ventilation system (i.e., exhaust fans ratings and make-up air supply capacities) design (i.e., blueprints and mechanical engineer reports).
2. Results of OSH inspections and IH surveys.
3. Results of the Air Contaminants Safety Awareness Program reviews and assessments of the plant's existing ventilation system, OSH inspections, and IH surveys. This allows the supervisor or IIC to identify areas within the plant that routinely handle, use, or store hazardous chemicals or toxic materials and determine if the identified areas are equipped with a ventilation system that provides a workplace environment free from known air contaminants.

C. **Reviews the Logs of On-Duty Injuries and Illnesses (FSIS Forms 4791-17).** Reviews and analyzes FSIS Forms 4791-17 for FSIS employees assigned to work in plants where hazardous chemicals or toxic materials are routinely present in order to identify over-exposure possibilities.

D. **Protects Employees From Exposure.** Reviews FSIS Directive 4791.5 including the most up-to-date MSDS's and makes periodical OSH inspections to assess that:

1. Plant management is adhering to the MSDS guidelines for using hazardous chemicals.

2. Incompatible hazardous chemicals are not being mixed by plant employees, especially housekeeping personnel, resulting in employee exposure to air contaminants.

X. AIR CONTAMINANTS EXPOSURE PROCEDURES

Air contaminants exposure conditions for a safe and healthy workplace are to be initially measured according to the OSHA standards in 29 CFR 1910.1000. When an unhealthful air contaminant exposure condition is suspected in the plant, the supervisor or IIC will issue chemical-direct reading badges or detector tubes for a specific known airborne contaminant such as ammonia, carbon dioxide and chlorine, to be worn by FSIS employees assigned to the suspected work areas. (**NOTE:** Chemical-direct reading badges or detector tubes for known airborne contaminants are issued through the Regional OSH Official. However, all known chemicals' airborne contaminant concentrations cannot be determined by direct reading badges or detector tubes.) The following exposure procedures and guidelines apply.

A. If a chemical badge or tube indicates levels of chemical exposure above OSHA PELs, the supervisor or IIC shall ensure that the employee's amount and duration of exposure to any air contaminant is limited to those levels specified in 29 CFR 1910.1000. The supervisor or IIC will:

1. Conduct immediate withdrawal of employees from the affected work area(s), as necessary, to assure that employees are no longer exposed to a chemical above PELs.

2. Inform plant management of the withdrawal of FSIS employees from the affected areas, the circumstances, and the plan to return to duty when concentration of the chemical no longer exceeds PELs.

3. Contact the immediate supervisor. The supervisor will contact the Regional OSH Official. The Regional OSH Official immediately becomes involved to resolve the exposure problem (**NOTE:** A mechanical engineer, IH, or other qualified person may be used in the air contaminant exposure evaluation if determined to be necessary by the Regional OSH Official and the IO Safety and Health Manager.)

B. If a chemical badge or tube indicates levels of chemical exposure **safely below** OSHA PELs, but FSIS employees **continue** to complain of headaches, sore eyes, sore throats or other physical aches, the supervisor or IIC requests the area supervisor to contact the Regional OSH Official. The Regional OSH Official immediately becomes involved to resolve the suspected exposure problem (**NOTE:** A mechanical engineer, IH, or other qualified person may be used in the suspected air contaminant exposure evaluation if

determined to be necessary by the Regional OSH Official and the IO Safety and Health Manager.)

C. If the air contaminants in the FSIS employee work areas are **not known**, but FSIS employees complain of physical symptoms similar to those described in subparagraph B., follow the same procedures in subparagraph B. The Regional OSH Official immediately becomes involved to resolve the exposure problem (**NOTE:** A mechanical engineer, IH, or other qualified person may be used in the suspected air contaminant exposure evaluation if determined to be necessary by the Regional OSH Official and the IO Safety and Health Manager.)

XI. COMMUNICATING WITH PLANT MANAGEMENT

When an air contaminant exposure condition is determined by any means including OSH inspections and IH surveys, the in-plant supervisor or IIC with assistance from the field office staff and the Regional OSH Official, shall immediately contact and meet with plant management. The in-plant supervisor, IIC, and/or area supervisor shall:

A. Implement administrative controls as needed, and recommend to plant management that engineering controls or other controls be implemented to abate the air contaminant problem (**EXAMPLES:** Administrative controls would be work practice changes or modifications, and engineering controls would be ventilation changes, chemical substitution, process isolation, and equipment modifications.)

B. Recommend to plant management when controls listed in subparagraph A. are not feasible to achieve full abatement, that protective equipment or other protective measures (**EXAMPLES:** installing gas alarms at work stations and establishing a gas detectors/monitors exposure program) be implemented to keep the exposure within OSHA PELs.

C. Inform plant management of the withdrawal of FSIS employees from the plant to the extent necessary to assure FSIS employee protection.

XII. MEDICAL EVALUATION

Medical tests and medical monitoring shall be established and provided for

FSIS employees required to conduct work tasks in plants where IH tests or OSH inspections have confirmed exposure over the PELS or FSIS employees have complained of physical symptoms similar to those described in Subparagraph X. B.

A. **Physician.** The required medical tests and medical monitoring shall be supervised by a physician and the extent of the medical services provided will be dictated by the FSIS employee's exposure to the hazardous chemical. The employee should provide the physician with information related to the chemicals (i.e., copies of MSDS's) to which he or she was exposed, the nature of the symptoms experienced, and the results of any IH surveys or air contaminant sampling performed at the duty location related to the air contaminant exposure.

B. **Workplace Injuries.** FSIS employees injured from exposure to air contaminants of hazardous chemicals, confirmed by IH tests or OSH inspections to have been over the PELS, are classified as workplace injuries or illnesses. See FSIS Directive 4810.1 for compensation benefits and claim filing instructions.

XIII. **RECORDKEEPING**

Keep the testing and monitoring results records used to determine exposure to air contaminants for the duration of the affected employee's employment plus 30 years. All employee medical records on medical tests and medical monitoring are confidential and are kept according to FSIS Directive 4293.1.

XIV. **ASSISTANCE AND CONSULTATION**

Field supervisors needing immediate assistance or consultation to determine whether exposure to hazardous employment conditions exists in their field workplaces may contact an OSH Official or the IO Safety and Health Manager directly. IP and RP field employees who work in or visit a meat, poultry, or egg products plant may request assistance from the Regional OSH Official. They may contact an in-plant supervisor or IIC, or the Area or Regional Office. **NOTE:** FSIS employees have the right to report air contaminants exposure conditions in their workplace environments to appropriate OSH officials.

Deputy Administrator
Administrative Management